



STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

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June 21, 1985

CERTIFIED RETURN RECEIPT REQUESTED
P-592-429-606

Hand Delivered

Mr. Andrew C. King
Genwal Coal Company
P.O. Box 1201
Huntington, Utah 84528

Dear Mr. King:

Re: Deficiency Response for plans for abatement of NOV, N85-4-5-2, 2 of 2, N85-4-12--3, 1 of 3, N85-4-12-3, 3 of 3, Genwal Coal Company, Crandall Canyon, ACT/015/032, Emery County, Utah

The Division has reviewed your submittal of May 23, 1985 concerning the abatement of Notice of Violations 85-4-5-2, 2/2, 85-4-12-3, 1/3, 85-4-12-3, 3/3. The submittal is extremely conceptual in nature and therefore, very little review can be conducted at this time. The operator must submit complete and adequate plans and designs before the Division can complete the required review and grant final approval. The Division generally agrees in concept with the proposed surface facilities location and layout. However, as designs are submitted for review, the Division may require changes in the plan as appropriate. The following concerns and deficiencies must be addressed before our review can proceed.

- 1) Detailed designs and plans, including all calculations and assumptions, must be submitted.
- 2) UMC 817.57 requires a buffer zone of 100 feet be maintained along all perennial streams. The operator will be required to reflect this buffer zone on all plans. Pad development should not extend beyond the inside edge of the existing forest access road.

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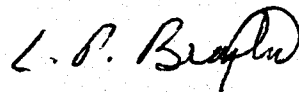
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- 3) The previously approved plan required a culvert to be placed beneath the pad to divert undisturbed runoff from the surface facilities. The new submittal proposes to use undisturbed diversion ditches to replace the culvert. The Division feels that the culvert may be the preferred alternative, but without design details for the size of the diversion, a determination cannot be made at this time. If the diversions will be excessively large and/or require excessive slope cutting for installation, the Division will require that the original design be implemented.
- 4) The sediment pond must be enlarged prior to any further disturbance on the permit area. As stated previously, complete sediment control plans and designs must be submitted.
- 5) The submittal refers several times to levels of contaminated soil "beyond normal operating conditions". This statement needs clarification and specific criteria defined.
- 6) The operator must submit more detailed plans for disposal of contaminated soil. The operator must locate and propose a disposal site for Division approval. The submittal states that soil "may be stored on site temporarily". The operator must commit to a maximum time that this storage may occur. The submittal states that "the material will be stored in a manner that will protect ...". Details of the manner of storage must be submitted.
- 7) The submittal states that access to the substation will be restricted. It is suggested that the access road be controlled by a gate or other means to insure limited use and vegetation success.
- 8) The Division feels that the existing surface facilities area to the south of the road be reclaimed and not used as parking as proposed. This area clearly encroaches within the buffer zone as required by 817.57.
- 9) Plans for downspouts or other bank protection measures must be submitted for all diversions draining down the channel bank of Crandall Creek.
- 10) Provide detailed plans for storage of all materials including noncoal waste, timbers, oil and gas, etc.

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Again, the Division emphasizes that this letter is not an approval for the proposed designs nor a commitment that the proposed configuration will be approvable following submittal of detailed designs. The deficiencies must be completely addressed, and submitted to this office by July 26, 1985. The construction season at the Genwal site is short and we must expedite this approval in order to meet the September 1, 1985 deadline for implementation as requested by the Forest Service. If you have any questions, please call myself or Rick Summers of my staff.

Sincerely,



L. P. Braxton
Administrator
Mineral Resource Development
and Reclamation Program

RPS:jvb
cc: Reed Christensen
Allen Klein
Dave Cline
Wayne Hedberg
Joe Helfrich
Dave Lof
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